

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 21-10502 JCM
	:	
MICHAEL DANIEL GLEBA,	:	HONORABLE JOHN C. MELARAGNO
Debtor	:	
	:	CHAPTER 13
U.S. BANK TRUST, NA	:	
Movant,	:	RELATED TO CLAIM # 3
	:	
v.	:	
	:	
MICHAEL DANIEL GLEBA; and RONDA J.	:	
WINNECOUR, CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE  
FILED IN COMPLIANCE WITH THE LOCAL RULES

I hereby certify as counsel for the Debtor that the existing Chapter 13 Plan is adequately funded  
and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin  
Michael S. Jan Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222, Extension 1045  
Facsimile: 814-833-6753  
E-Mail: [mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtor, Michael Daniel Gleba

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 21-10502 JCM
	:	
MICHAEL DANIEL GLEBA,	:	HON. JOHN C. MELARAGNO
Debtor	:	
	:	CHAPTER 13
U.S. BANK TRUST, NA,	:	
Movant,	:	RELATED TO CLAIM NO. 3
	:	
v.	:	
	:	
MICHAEL DANIEL GLEBA; and RONDA J.	:	
WINNECOUR, CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING  
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on Wednesday, January 29, 2025.

The type of service made on the parties was made via Electronic Notification via the CM/ECF System (NO PAPER COPY).

- Office of the United States Trustee at [ustregion03.pi.ecf@usdoj.gov](mailto:ustregion03.pi.ecf@usdoj.gov)
- Ronda J. Winnecour at [cmecf@chapter13trusteewdpa.com](mailto:cmecf@chapter13trusteewdpa.com)
- Denise Carlon on behalf of Creditor U.S. Bank Trust National Association, not in its individual capacity, but solely as Trustee of LSF10 Master Participation Trust at [dcarlon@kmlawgroup.com](mailto:dcarlon@kmlawgroup.com)
- Lauren Moyer on behalf of Creditor Fay Servicing, LLC as servicer for U.S. Bank Trust NA, not in its individual capacity, but solely as Trustee of LSRMF MH Master Participation Trust at [bkecf@friedmanvartolo.com](mailto:bkecf@friedmanvartolo.com), [bankruptcy@friedmanvartolo.com](mailto:bankruptcy@friedmanvartolo.com)

DATED: January 29, 2025

Respectfully submitted,  
THE QUINN LAW FIRM

BY: /s/ Michael S. Janin  
Michael S. Janin, Esquire  
PA Id. No. 38880  
2222 West Grandview Boulevard  
Erie, Pennsylvania 16506-4508  
Telephone: 814-833-2222, Ext. 1045  
Facsimile: 814-833-6753  
E-Mail: [mjanjanin@quinnfirm.com](mailto:mjanjanin@quinnfirm.com)  
Counsel for Debtor, Michael Daniel Gleba